

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

B.P.J., by her next friend and mother, HEATHER
JACKSON,

Plaintiff,

v.

Civil Action No. 2:21-cv-00316
Hon. Joseph R. Goodwin, District Judge

WEST VIRGINIA STATE BOARD OF
EDUCATION, HARRISON COUNTY BOARD
OF EDUCATION, WEST VIRGINIA
SECONDARY SCHOOL ACTIVITIES
COMMISSION, W. CLAYTON BURCH in his
official capacity as State Superintendent, and
DORA STUTLER in her official capacity as
Harrison County Superintendent,

Defendants.

**DEFENDANT HARRISON COUNTY BOARD OF EDUCATION AND
DEFENDANT DORA STUTLER IN HER OFFICIAL CAPACITY'S
MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT
RESPONDING TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Defendant the Harrison County Board of Education (both by the agency and by Dora Stutler in her official capacity as Harrison County Superintendent, collectively, "the County Board"), hereby moves pursuant to S.D.W. VA. L.R. CIV. P. 7.1(a)(2) for leave to file a thirty-page long response in opposition to DE #2, Plaintiff's motion for preliminary injunction.

Good cause exists to grant the County Board's motion because the propriety of a preliminary injunction and the likelihood of Plaintiff succeeding on Count I (a 20 U.S.C. § 1681 ("Title IX") claim) and Count II (a 42 U.S.C. § 1983 Equal Protection claim) are all complex questions with many parts and subparts. Furthermore, this case, including the propriety of the sought-after preliminary injunction, has tremendous local, statewide, and national importance. Finally, the County Board seeks only a couple of pages more than the motion that the County

Board is opposing (which also contained voluminous pages of attached exhibits). Accordingly, the County Board respectfully requests the Court to **GRANT** this motion.

Respectfully submitted this 21st day of June, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of June, 2021, I electronically filed a true and exact copy of “*Defendant Harrison County Board of Education and Defendant Dora Stutler in her Official Capacity’s Motion for Leave to Exceed the Page Limit Responding to Plaintiff’s Motion for Preliminary Injunction*” with the Clerk of Court using the CM/ECF System, which will send notification of such filing to the following counsel of record:

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